

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA

v.

KENNETH JOHN DEINES,

Defendant.

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Case No. 2:16-CR-47-AWA-DEM

MOTION TO FILE UNDER SEAL
DEFENDANT’S POSITION WITH REGARD TO SENTENCING FACTORS
AND MOTION FOR DOWNWARD DEPARTURE AND/OR VARIANCE

Defendant Kenneth John Deines (“Defendant”), through counsel, respectfully move this Court for an order providing that Defendant’s Position with Regard to Sentencing Factors and Motion for Downward Departure and/or Variance be filed under seal and that the document should remain under seal.

Respectfully submitted this the 20th day of October, 2016.

/s/ William P.H. Cary

William P.H. Cary
Virginia State Bar No. 16342
wcary@brookspierce.com

/s/ Kearns Davis

Kearns Davis*
N.C. State Bar No. 22014
kdavis@brookspierce.com
BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, LLP
150 Fayetteville Street
1600 Wells Fargo Capitol Center
Raleigh, NC 27601
Telephone (919) 839-0300
Fax (919) 839-0304

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

This the 20th day of October, 2016.

/s/ William P.H. Cary

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Virginia State Bar No. 16342
wcary@brookspierce.com
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